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Attorneys for Petitioner
CASIMIRO JOSE CANHA CAVACO DIAS

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

In the Matter of I.D., N.D., and C.D.:

CASIMIRO JOSE CANHA CAVACO DIAS,

Petitioner,

and

RULA NABIL KHOURY CAVACO DIAS

Respondent.

Case No. 3:24-cv-04471-EMC

**MOTION TO REPLACE ECF. 121 – 4
WITH A REDACTED VERSION**

DATE: OCT. 29-31, NOV. 4, 2024

CTRM: 5

JUDGE: HON. EDWARD M. CHEN

Petitioner, CASIMIRO JOSE CANHA CAVACO DIAS (“Petitioner”), by and through his undersigned counsel, respectfully moves this Court for an order allowing Petitioner to file a redacted version of ECF 121 – 4 to replace the unredacted version to safeguard the identity of the subject Children.

I. INTRODUCTION

Petitioner respectfully requests that this Court permits the filing of a replacement for ECF No. 121-4 with a redacted version. Subsequent to several productive meet-and-confer sessions, counsel successfully prepared a joint conference statement in accordance with the Court's amended case management order [ECF No. 90]. As part of the witness list, the Court directed the parties to include, as exhibits, any expert reports along with the expert's CVs. Petitioner inadvertently provided Respondent, who had agreed to file the joint statement and corresponding exhibits, with the unredacted version of Petitioner's Armenian expert report. Petitioner only realized after the filing that the children's names were disclosed. Petitioner, through this motion, hopes to replace ECF No. 121-4 with the redacted version that was originally intended to be sent to Respondent.

II. BACKGROUND

On September 16, 2024, the Court ordered the parties to submit a joint pretrial conference statement. [ECF No. 90]. On October 9, 2024, Petitioner and Respondent finalized and submitted a pre-trial joint conference statement to the Court. On October 10, 2024, Petitioner contacted the ECF Help Desk of the United States District Court of the Northern District of California to seek assistance on how to replace the unredacted version with a redacted version. With the approval and consent of Respondent, the ECF Help Desk temporarily locked ECF No. 121-4. Through this motion, Petitioner requests that the Court allow the replacement of ECF No. 121-4 with a redacted version. Prior to filing, on October 9th, Petitioner inadvertently provided Respondent with the unredacted version of Petitioner's Armenian expert report. After filing, Petitioner discovered that the children's names were not covered. Petitioner now seeks to replace the unredacted document with the intended redacted version to safeguard the identity of the Children.

III. CONCLUSION AND RELIEF SOUGHT

Petitioner respectfully requests that the Court grant Petitioner's request to replace ECF No. 121-4 with a redacted version. Petitioner also respectfully requests that the Court orders the permanent removal of ECF No. 121-4 and grant leave to Petitioner to file a redacted version in

1 its place.

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3 Dated: October 11, 2024

4 Respectfully submitted,

5 /s/ Kelly J. Shindell DeLacey

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